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17 *Attorneys for Defendants*

18 UBER TECHNOLOGIES, INC.; and RASIER, LLC

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA**

21 **OAKLAND DIVISION**

22 LS 134, an individual,

23 Plaintiff,

24 v.

25 UBER TECHNOLOGIES, INC.,
26 a Delaware Corporation; RASIER, LLC,
27 a Delaware Limited Liability Company;
28 and DOES 1 through 50, Inclusive.

Defendants.

Case No. 4:23-cv-03811-JSW

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF DEFENDANTS UBER
TECHNOLOGIES, INC. AND RASIER, LLC'S
MOTION TO TRANSFER VENUE TO THE
NORTHERN DISTRICT OF ILLINOIS**

Date: December 1, 2023

Time: 9:00 a.m.

Courtroom: 5 – 2nd Floor

Action Filed: August 1, 2023

Trial Date: None Set

1 **TO THIS HONORABLE COURT:**

2 Defendants Uber Technologies, Inc. and Rasier LLC (“Uber”) request that the Court take
3 judicial notice, pursuant to Federal Rule of Evidence 201, of certain evidence in support of its
4 Motion to Transfer Venue to the Northern District of Illinois.

5 Under Federal Rule of Evidence 201, a federal court may take judicial notice of facts that
6 “can be accurately and readily determined from sources whose accuracy cannot reasonably be
7 questioned.” Fed R. Evid. 201(b)(2). Judicial notice of such facts must be taken when requested
8 by a party who supplies the court with the necessary information. *Id.* Rule 201(c)(2). Proceedings
9 and orders by other courts, whether in the state or federal system, may be judicially noticed.
10 *Duckett v. Godinez*, 67 F.3d 734, 741 (9th Cir. 1995); *Dawson v. Mahoney*, 451 F.3d 550, 551 n.1
11 (9th Cir. 2006).

12 Uber respectfully requests the Court take judicial notice of the following orders by the
13 Superior Courts of California related to Uber’s Motion to Transfer Venue to the Northern District
14 of Illinois

15 1. The Superior Court of California for the County of San Francisco’s January 23,
16 2023 Order granting Uber’s Motion to Stay or Dismiss Based on *Forum Non Conveniens* in *In re*
17 *Uber Rideshare Cases*, CJC-21-005188. This document is attached as **Exhibit 1** to the Declaration
18 of Randall S. Luskey in Support of Uber’s Motion to Transfer Venue to the District of New Jersey.

19 2. The Superior Court of California for the County of San Francisco’s August 11,
20 2017 Order Granting Uber’s Motion to Dismiss Based on *Forum Non Conveniens* in *Jane Doe v.*
21 *Uber Techs., Inc.*, CGC-17-556481. This document is attached as **Exhibit 2** to the Declaration of
22 Randall S. Luskey in Support of Uber’s Motion to Transfer Venue to the District of New Jersey.

23 3. The Superior Court of California for the County of San Francisco’s March 24, 2020
24 Order Granting Uber’s Motion to Stay Based on *Forum Non Conveniens* in *Jane Doe v. Uber*
25 *Techs., Inc.*, CGC-19-579901. This document is attached as **Exhibit 3** to the Declaration of
26 Randall S. Luskey in Support of Uber’s Motion to Transfer Venue to the District of New Jersey.

1 4. The Superior Court of California for the County of San Francisco's July 1, 2019
2 Order Granting Uber's Motion to Dismiss Based on *Forum Non Conveniens* in *Gorne & Walker*
3 v. *Uber Techs., Inc.*, CGC-19-575852. This document is attached as **Exhibit 4** to the Declaration
4 of Randall S. Luskey in Support of Uber's Motion to Transfer Venue to the District of New Jersey.
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6 DATED: September 8, 2023

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

8 By: /s/ Randall S. Luskey
9 RANDALL S. LUSKEY
10 ROBERT ATKINS

11 *Attorney for Defendants*
12 UBER TECHNOLOGIES, INC.
13 and RASIER, LLC
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